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April 28, 2020

Via ECF

Honorable Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Christopher Reese-Thomas*
Case No. 02-cr-441 (AMD)

Dear Judge Donnelly:

I represent Christopher Reese, pro bono, in his request for a reduction in sentence under 18 U.S.C. § 3582(c) in this case and SDNY case number 12-cr-629 (VM). I respectfully request that this Court defer ruling on Mr. Reese's pro se motion for emergency compassionate release until I can supplement it with further evidence and legal argument. I am currently collecting records related to Mr. Reese's medical history as well as his attempts to exhaust administrative remedies.¹ I intend to file a supplemental motion, at the latest, by Friday, May 8—30 days after Mr. Reese's initial request to the warden for COVID-19 related release to home confinement.

Respectfully submitted,
/s/
Matthew A. Wasserman

cc: AUSA Andrew Wang (by ECF)

¹ The medical records I have thus far obtained indicate that Mr. Reese suffers from congestive heart failure, hypertension, diabetes, and asthma. Each of these is a medical condition that courts have relied upon, on its own or in combination with other factors, in granting release since the start of the COVID-19 pandemic. See, e.g., *United States v. Bess*, 16-cr-156, 2020 WL 1940809, at *8-11 (W.D.N.Y. Apr. 22, 2020) (congestive heart failure, diabetes, and hypertension); *United States v. Zukerman*, 16 Cr. 194 (AT), 2020 WL 1659880, at *4-6 (S.D.N.Y. Apr. 3, 2020) (diabetes and hypertension); *United States v. Hernandez*, 18 Cr. 834-04 (PAE), 2020 WL 1684062, at *3-4 (S.D.N.Y. Apr. 2, 2020) (asthma).